UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:

Case No. 19-34574-KRH

LeClairRyan PLLC,

Chapter 7

Debtor.1

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

Adv. Pro. 20-03142-KRH

VS.

ULX Partners, LLC, UnitedLex Corporation, and ULX Manager, LLC,

Defendants.

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

Adv. Pro. 21-03095-KRH

VS.

CVC Capital Partners, Daniel Reed, Nicholas Hinton, Josh Rosenfeld, and P. Douglas Benson,

Defendants.

NOTICE OF MOTION TO EXPEDITE HEARING

PLEASE TAKE NOTICE that Foley & Lardner LLP ("Foley"), by and through its undersigned counsel, has moved the Court for an expedited hearing (the "Motion") on Foley & Lardner LLP's Motion Requesting Authorization to Seal Its Limited Objection to the Trustee's

Susan Poll Klaessy (VSB No. 87021) FOLEY & LARDNER LLP 3000 K Street, NW, Suite 600 Washington, DC 20007-5109 (312) 832-4500 (telephone) (312) 832-4700 (facsimile) spollklaessy@foley.com

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

Motion and Memorandum of Law for Entry of an Order (I) Approving (A) Judicially Mediated Settlement and (B) Compensation to Counsel Including an Improvident Payment Under Section 328(a); and (II) Granting Related Relief [Docket No. 1363].

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Motion carefully and discuss it with your attorney if you have one in this Chapter 7 Case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that on September 4, 2019, the Court entered the Order Establishing Certain Notice, Case Management and Administrative Procedures [ECF. No. 38] (the "Case Management Order"), which approved the Notice, Case Management, and Administrative Procedures attached as Exhibit 1 to the Case Management Order (the "Case Management Procedures"). The Case Management Procedures, among other things, prescribe the manner in which Objections must be filed and served and set forth when certain hearings will be conducted. A copy of the Case Management Order may be obtained, free of charge, by written request to spollklaessy@foley.com, or, for a fee, at http://ecf.vaeb.uscourts.gov.

PLEASE TAKE FURTHER NOTICE if you do not want the Court to grant the relief requested in the Motion, or if you want the Court to consider your views on the Motion, then on or before **one (1) day** before the scheduled hearing date of June 8, 2022, you or your attorney must:

(X) File with the Court, either electronically or at the address shown below, a written request for a hearing, or a written response to the Motion pursuant to Rule 9013-1(H) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Virginia. If you mail your written response to the Court for filing at the address of the clerk below, you must mail it early enough so the Court will **receive** it on or before the date set for a hearing on this Motion.

If a response is not properly and timely filed and served, the Court may deem any opposition waived, treat the Motion as conceded and enter an appropriate order granting the requested relief without further notice or hearing.

Clerk of the Court United States Bankruptcy Court 701 East Broad Street, Suite 4000 Richmond, VA 23219

In accordance with the Case Management Procedures, you must also serve a copy of your written response on the Core Parties, the 2002 List Parties and any Affected Entity so that the Objection is received on or before the Objection Deadline.

PLEASE TAKE FURTHER NOTICE that the Court will entertain the Motion on **June 8, 2022, at 1:00 p.m.** (or such time thereafter as the matter may be heard). In connection with the same, the undersigned will appear before The Honorable Kevin R. Huennekens, United States Bankruptcy Judge. Due to the COVID-19 public health emergency, no in-person hearings are being held. This hearing will take place remotely through Zoom on the date and time scheduled herein. To appear at the hearing, you must use the following Zoom registration link:

https://www.zoomgov.com/meeting/register/vJItc--rrz4jHfonPb6c3FARuCippfQvj4g

Listen-only conference line[s]:

Dial: 1-866-590-5055 Access Code: 4377075 Security Code: 6822

Dated: June 3, 2022 Respectfully submitted,

/s/ Susan Poll Klaessy
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 3rd day of June, 2022, a true and correct copy of the foregoing document was served via first class mail and/or electronic mail upon: (i) all parties and counsel requesting service via the Court's ECF system, (ii) the Office of the United States Trustee, (iii) Special Counsel to Lynn L. Tavenner, Chapter 7 Trustee, (iv) the 20 largest unsecured creditors as listed on the Debtor's schedules, (v) the defendants in the above-captioned adversary proceedings, (vi) all Persons identified in paragraph 4 of the FAO Procedures Order, and (vi) the Service List as defined by the governing Case Management Order and filed by counsel to the Chapter 7 Trustee.

/s/ Susan Poll Klaessy

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